

### LOS ANGELES COUNTY FIRE DEPARTMENT HEALTH HAZARDOUS MATERIALS DIVISION UNIFIED PROGRAM AGENCY



## SPENT LEAD-ACID BATTERY MANAGEMENT GUIDANCE DOCUMENT

**GD - 6- HW- 2007** 

#### BACKGROUND

Spent lead-acid batteries from automobiles contain lead and sulfuric acids and are fully regulated as a hazardous waste. However, when intact they can be managed for recycling, and the handling requirements are relaxed. Generators of lead-acid batteries include auto repair shops, parts stores and service stations, as well as other businesses and factories that generate dead or damaged batteries. Businesses must take care in the way that they store batteries prior to shipment to a recycler, as follows.

#### STORAGE REQUIREMENTS

Undamaged batteries should be stored upright on a covered pallet over a non-reactive, curbed and sealed surface such as coated concrete or asphalt, and care should be taken to prevent the terminals from short-circuiting.

Damaged batteries are batteries that are cracked, broken, or missing one or more caps. The business must store and transport damaged batteries in non-reactive, structurally-secure, closed containers such as polyethylene buckets or drums. If missing caps can be replaced and there are no other leaks or damage, the battery can be managed along with intact batteries.

### **ACCUMULATION REQUIREMENTS**

Businesses must label containers holding damaged batteries in ink or paint with the date the first battery was placed there. This is considered the accumulation start date. There are no labeling requirements for undamaged batteries, but there are associated accumulation time limits for both damaged and undamaged batteries, as follows:

- Businesses that have less than one ton of batteries may store the batteries on site for no more than one year.
- Businesses that have more than one ton of batteries may not store them longer than 180 days.

If these quantities or times are exceeded, the business is no longer exempt from the regulations for generation, storage and transportation of hazardous waste.

### TRANSPORTATION REQUIREMENTS

If a business ships more than 10 batteries at a time, a legible hazardous waste manifest or a legible bill of lading must accompany the shipment. The generator, transporter and storage, recycling, or disposal facility each must retain their copies of either of those documents for three years. The bill of lading must be dated and show the name and addresses of the generator, transporter, and receiving location, as well as the number of batteries transported. The business may transport damaged batteries (packaged as described above) with intact batteries, as long as all Department of Transportation (DOT) standards are met.

#### RECORD KEEPING REQUIREMENTS

Businesses generating or handling more than 10 batteries per year and those who transport more than 10 batteries at a time are required to keep all copies of bills of lading and manifests related to the transportation of lead-acid batteries for a period of at least three years.

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Businesses generating no more than 10 batteries per year, and storing or transporting no more than 10 batteries at one time, are not subject to the reporting and record keeping, requirements given in the battery regulations as long as the batteries will go to someone who stores, recycles, uses, reuses or reclaims them. This also applies to people who trade in an old battery for a new one and to the person accepting the trade-in. All businesses, however, must comply with storage and accumulation requirements given in the battery regulations.

#### Disclaimer

This guidance document does not replace or supersede relevant statutes and regulations. It is intended for informational purposes only and may not encompass all of the statutes and regulations to this topic. More details may be found at Cal EPA Department of Toxic Substances Control (DTSC) <a href="www.dtsc.ca.gov">www.dtsc.ca.gov</a>. If further information is needed, call the County of Los Angeles CUPA at (323) 890-4045.